

EXHIBIT D

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Attorneys for Defendant,
FCA US LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ROSA LUNA,

Case No.: 2:21-cv-07140-AB-JPR

Plaintiff,

v.

**STIPULATION REGARDING
PLAINTIFF'S ATTORNEY'S FEES,
COSTS AND EXPENSES**

Honorable Judge Andre Birotte Jr.

**FCA US LLC, a Delaware Limited
Liability Company; and DOES 1
through 10, inclusive,**

Defendants.

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiff ROSA LUNA (“**Plaintiff**”) and Defendant FCA US LLC (“**Defendant**”) (collectively, “**the Parties**”), by and through their respective counsel of record, hereby enter into the following stipulation for entry of an Order by the Court as follows:

WHEREAS, this matter was settled on or about October 19, 2021.

WHEREAS, per the Rule 68 Offer entered into by the Parties, Defendant agrees that the judgment may include an award of attorneys’ fees recoverable by agreement between the parties or motion as allowed by law.

WHEREAS, the Parties now seek to resolve the issue of Plaintiff’s attorney’s fees, costs and expenses without further litigation on terms just and fair to all parties and hereby enter into the following Stipulation of Attorney’s Fees, Costs and Expenses (“the Stipulation”).

THEREFORE, THE PARTIES HEREBY STIPULATE TO THE ENTRY OF AN ORDER AS FOLLOWS:

- (1) That Defendant shall pay the sum of \$4,500.00 to Plaintiff and Plaintiff hereby agrees to accept said payment in full satisfaction of all claims for attorney’s fees, costs and expenses in connection with this action;
- (2) That Defendant shall pay the sum of \$4,500.00 to Plaintiff within 75 days of October 19, 2021 unless matters outside of the control of Defendant cause delay;
- (3) Each of the undersigned represents that he or she has been duly authorized to enter into the Stipulation.

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1 **IT IS SO STIPULATED.**

2 Dated: October 19, 2021

KNIGHT LAW GROUP, LLP

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4
5 /s/ Daniel Kalinowski

6 Steve Mikhov (SBN 224676)

7 Daniel Kalinowski (SBN 305087)

8 Attorneys for Plaintiff,

ROSA LUNA

9 Dated: October 19, 2021

ROSEWALDORF LLP

10
11 /s/ Mark Skanes

12 Mark W. Skanes (SBN 322072)

13 Attorney for Defendant,

FCA US LLC